

EXHIBIT G

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TRAFFICSCHOOL.COM, INC., a)
California corporation;)
DRIVERS ED DIRECT, LLC, a)
California limited liability)
company,)
Plaintiffs,)
vs.) Case No. CV
EDRIVER, INC., ONLINE GURU,) 06-7561 PA (CWx)
INC., FIND MY SPECIALIST,)
INC., AND SERIOUSNET, INC.,)
California corporations;)
RAVI K. LAHOTI, an)
individual; DOES 2 through)
10,)
Defendants.)

Deposition of STEVE MORETTI
taken at 221 North Figueroa Street, Suite 1200
Los Angeles, California, commencing at
10:33 a.m., Friday, June 29, 2007, before Nila
Ganahl, CSR No. 4982.

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1 MR. DeCARLO: By the way, Mr. Daucher, we got 2 some financial documents, but it's only related to 3 certain categories and it was only gross revenues. Are 4 you planning on giving us --	1 Q Yes. 2 A I believe we have five. 3 Q Okay. Who are they, can you name them? 4 A ContinuedEd.com, which also does business as i 5 Drive Safely.
5 MR. DAUCHER: I'm not going to meet and confer 6 on the record.	6 Q ContinueEd.com owns i Drive Safely? 7 A Yeah. 8 Q Okay. 9 A American Safety Classes. 10 Q Okay. 11 A Driving University. 12 Q Okay. 13 A Online Traffic School and the fifth one, can't 14 remember off the top of my head.
12 MR. DAUCHER: I'm not here to answer questions 13 today. Are you going to answer my questions?	14 Q Okay. Every state has different requirements 15 with regard to traffic school requirements -- that's a 16 bad question.
14 MR. DeCARLO: Sure.	17 Do you know if every state has different 18 requirements for what constitutes a valid traffic 19 school course?
15 MR. DAUCHER: When are you going to produce one 16 document in this case?	21 A I'm aware that states have variations state to 22 state.
17 MR. DeCARLO: You'll have to ask somebody else 18 about that, I'm not dealing with the document 19 production. Well, there's a reason why. I have the 30 20 B (6) witness in front of me and I don't have any cost 21 data or profit data, and unless --	23 Q Does Online Guru keep up to date on what those 24 requirements are?
22 MR. DAUCHER: Show me where in the 30 B (6) 23 designation it talks about cost, because I don't see 24 it. All I see is Category 9, gross receipts from sales 25 commissions or other revenue generated from DMV.org.	25 A We try to.
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1 If you can show me something where I should have 2 prepared him for cost, then we'll talk.	1 Q How do you do that?
3 MR. DeCARLO: And you don't want to answer the 4 question about whether you're going to give me cost 5 data?	2 A Through external writers and researchers. 3 Q You have people on staff whose job it is to 4 research the requirements of the respective state DMVs?
6 MR. DAUCHER: I'm not going to meet and confer 7 on the record.	5 A Free-lance. 6 Q They're outsiders who you pay to do it? 7 A Correct. 8 Q They're not employees. Okay. 9 When you retain an outside fulfillment
8 MR. DeCARLO: Why?	10 company -- or not retain, but when you make a deal with 11 an outside fulfillment company, what, if anything -- 12 well, is there a process that you go through to 13 ascertain the qualifications of the referral source of 14 the fulfillment company?
9 MR. DAUCHER: Want to go off the record and 10 talk about it?	15 A I wouldn't say we do -- go through any 16 official background check per se, but we do business 17 with companies we feel are reputable companies in the 18 space that are also --
11 MR. DeCARLO: Sure, let's go off the record for 12 a second.	19 Q See, you used that word again.
13 (There was a discussion off the record.)	20 A -- that are also -- that are also marketing 21 online.
14 BY MR. DeCARLO:	22 And similar to your question earlier on 23 background checks, our partners have a responsibility 24 to comply with all applicable laws within the given 25 state that we're advertising.
15 Q All right. With regards to traffic school and 16 Drivers Ed, you don't provide those -- Online Guru is 17 not a provider of traffic school or Drivers Ed?	
18 A We don't provide fulfillment of those 19 products.	
20 Q The fulfillment is done by your referral 21 partners?	
22 A Correct.	
23 Q How many different fulfillment partners do you 24 have for traffic school?	
25 A Just for traffic school?	

16 (Pages 74 to 77)

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